

**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT**

Cause No. 16-120

**MOTION TO RE-CALL IMPANELED GRAND JURY AND TO APPOINT MISSISSIPPI
OFFICE OF THE ATTORNEY GENERAL AS PRO TEMPORE PROSECUTOR**

(FILED UNDER SEAL)

COMES NOW, the State of Mississippi by and through the Mississippi Attorney General's Office (MAGO), Division of Public Integrity, who prosecutes in and for the State of Mississippi and files it's "Motion to Re-call the Impaneled Grand Jury and to Appoint the Mississippi Office of the Attorney General as Special Prosecutor and in support of would show to wit:

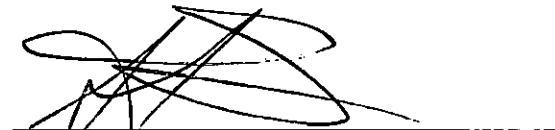
1. On or about July 20, 2015, the U.S. Department of Justice through its agents at the Federal Bureau of Investigations (F.B.I.) formally requested the assistance of the Office of the Attorney via written request. (See attached)
2. The request alleged that several cases, both violent and non-violent, had not been prosecuted by the Hinds County District Attorney's Office. The request went on to opine that the cases had not been pursued because all of the defendants have a relationship with Donald (Darnell) Turner.
3. The F.B.I has determined that the District Attorney (DA) and Mr. Turner are good friends and it is because of this friendship that the (DA) has chosen not to prosecute the instant cases.
4. Additionally, Deondra (Dee) Parker, the mother of two of Mr. Turner's children, is an employee at the District Attorney's office. According to records, Ms. Parker signed for one of the cases that has not been prosecuted by the DA's office. (See attached)
5. The agents of the F.B.I. have worked with local and state law enforcement agencies to provide cases to this office in which there is an apparent conflict which precludes the DA's office from having involvement in the prosecution of said cases.
6. The above cases have been reviewed by the MAGO and are ripe for presentation to the Hinds County Grand Jury.
7. Due to the forementioned conflict of interest of the DA's office and in order to avoid the appearance of impropriety, the State requests that the Court make a

finding of fact pursuant to Section 25-31-21 of the Mississippi Code that the District Attorney and any employees of that office are disqualified and prohibited from any involvement with the presentation of the above cases to the Grand Jury including but not limited to the prohibition of the DA and his employees from being present during the presentation of the cases to the Grand Jury.

8. This prohibition should also include the sealing of any indictments concerning these defendants from the District Attorney and his employees until either a no bill is returned by the grand jury or until the corresponding capiases are served.
9. The MAGO waives any claim to compensation under Section 25-31-21.

WHEREFORE PREMISES CONSIDERED, the State of Mississippi prays that this Court issue an order, under seal, Re-calling the Impaneled Grand Jury to hear the cases arising from the collaboration of the F.B.I. between local and state law enforcement agencies . The State also prays that this Court make a Pro tempore appointment of the Mississippi Office of the Attorney General as prosecutor in all said cases arising from the forementioned collaboration.

Respectfully submitted,



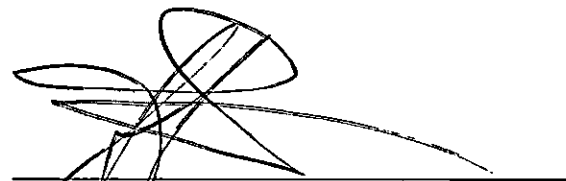
Assistant Attorney General

CERTIFICATE OF SERVICE

I, Stanley Alexander, hereby certify that upon receiving a hearing date from the Court, I will cause to be hand-delivered a true and correct copy of the foregoing Motion to:

Robert Smith
District Attorney
P.O. Box 22747
Jackson, Mississippi 39225

This the 17th of February, 2016



STANLEY ALEXANDER
MS BAR #9922

Office of the Attorney General
P.O. Box 220
Jackson, MS 39205
Tel: 601-359-4276



PI-13-60077

Major Investigations

327 East Pascagoula Street
Jackson, MS 39206
(601) 960-1310 -office #
(601) 960-1642 -fax #

MEMORANDUM

To: Robert S. Smith, District Attorney
From: Deric Hearn, Deputy Chief
Date: Monday, May 19, 2014
Re: Grand Jury Submission(s) – *see attachment*

Please see below listed cases that are being submitted to the Hinds County District Attorney's office for indictment process. After receiving and reviewing the below listed cases, if any member of your office recognizes a potential problem with any case, please have them bring it to my attention immediately. Our goal is to seek a successful indictment; therefore, we will do everything, within our power to correct or strengthen each case.

It is our goal to prepare and present each case without delay. With your cooperation and support this can be accomplished.

Please sign below or have your designee sign, indicating receipt of the attached felony cases(s). This sheet will be maintained by our office in an effort to increase case tracking. I offer my thanks, in advance. If you have any questions, please do not hesitate to contact me or one of my unit supervisors.

Delivered by: *Det. Eric Robinson* Date: 5-19-2014
Received by: *D. Hunter* Date: 5-19-2014

2014-011403	MCCREHEAD, WALTER	HOUSE BURGLARY	5/14/2014
2014-040421	GIBSON, ROOSEVELT	MURDER	5/19/2014
2014-040401	HENDERSON, JONATH	HOUSE BURGLARY OF AN OCCUPIED DWELLING	5/19/2014
2012-121035	MACK, CHARLES	DOMESTIC VIOLENCE AGGRAVATED ASSAULT	5/19/2014
2014-066964	WILDER, JESSIE	POSSESSION OF STOLEN FIREARM	5/19/2014
2014-081634	HICKS, TRAVIS MONTRELL	CONVICTED FELON IN P/S FIREARM	5/19/2014
2014-080867	SHARBER, JOSEPH P.	CONVICTED FELON IN P/S FIREARM	5/19/2014
2014-023073	WESLEY, DEVANTA	HOUSE BURGLARY	5/19/2014
2014-058363	BARNES, RAYMOND	CREDIT CARD FRAUD	5/19/2014
2014-086176	GIBSON, CLINTON	GRAND LARCENY	5/19/2014

2014-046942	DAVIS,CASSANDRA	CHILD ABUSE	
2014-052418	HOBBS,BRIDGETTE	EXPLOITATION OF VULNERABLE ADULT	5/19/2014
2013-186149	GREER,TANARI	POSSESSION OF MARIJUANA W/FIREARM	5/19/2014
2014-030022	LOWE,STEDMOND	POSS OF MARIJ WHILE IN POSS OF A FIREARM	5/19/2014
2014-019530	PAIGE,QUENTIN	POSS OF MARIJ WHILE IN POSS OF A FIREARM	5/19/2014
2014-019530	BROOKS,EDWARD	POSS OF MARIJ WHILE IN POSS OF A FIREARM	5/19/2014
2013-190029	BANKS,MONTEL	POSS OF MARIJUANA	5/19/2014
2013-190029	BANKS,CAROLYN	POSS OF MARIJUANA	5/19/2014
2013-179967	JERIGAN,IRA	POSSESSION OF MARIJUANA	5/19/2014
2012-256702	RUSSUM,TERRENCE	SELL OF CRACK COCAINE TO UC	5/19/2014
2013-180834	ROBINSON,KENDRICK	POSS OF MARIJ W/INTENT	5/19/2014
2013-180834	MIMS,ORLANDUS	CONSPIRACY TO POSSESS MARIJUANA W/INTENT	5/19/2014
2013-184130	JONES,CORY	POSSESSION OF MARIJUANA	5/19/2014
2013-184130	FORBES,COURTNEY	POSSESSION OF MARIJUANA	5/19/2014
2013-184130	RAMSEY,BRANDRICK	POSSESSION OF MARIJUANA	5/19/2014
2014-034312	MONGHUR,RICHARD	POSSESSION OF MARIJUANA	5/19/2014
2013-195795	GRANDERSON,NELON A.	POSS OF MARIJUAN W/INTENT TO DISTRIBUTE	5/19/2014
2013-232688	WHITE,TOMMY	POSSESSION OF MARIJUANA WITH INTENT	5/19/2014
2013-195194	LACKEY,DELVIN	POSSESSION OF MARIJUANA	5/19/2014
2014-001869	COLEMAN,RAYMOND	POSS OF MARIJUANA W/INTENT	5/19/2014
2014-001869	VAUGHN,LEADARRIS	POSSESSION OF MARIJUANA WITH INTENT	5/19/2014
2014-001869	TAYLOR,OCTAVIUS	POSS OF MARIJUANA WITH INTENT	5/19/2014
2013-223504	BUTLER,ROBERT	POSS OF MARIJUANA W/INTENT	5/19/2014
2013-236351	BRANSON,MARCUS	POSSESSION OF MARIJUANA	5/19/2014



U.S. Department of Justice

Federal Bureau of Investigation

Jackson Division
1220 Echelon Parkway
Jackson, MS 39213

September 11, 2015

Marvin Sanders
Special Assistant Attorney General
Office of the Attorney General
550 High Street, Suite 1200
Jackson, MS 39201

Special Assistant Attorney General Sanders,

In response to the inquiry regarding certain criminal cases originating in Hinds County that are being considered for prosecution by your office, the following information is contained in the relevant investigative files:

Donald (aka "Darnell") Turner is a close, personal associate of Hinds County District Attorney Robert Shuler Smith. Turner and Smith have a relationship that goes back many years. Extensive reporting indicates that Turner has been involved in a wide range of criminal activity but has never been charged by Smith's office. As recently as November of 2014, Turner was arrested by the Jackson Police Department for an aggravated domestic violence incident, but was not indicted by the District Attorney's Office.

Turner owns a trucking company, Southern Miss Transport LLC, that is under investigation for being a front for drug trafficking. James Mangum, the son of one of Turner's truck drivers, was involved in a homicide as part of a drug deal in Jackson in 2014. Mangum was arrested for the murder by the Jackson Police Department, but was never indicted by the District Attorney's Office.

Tommy White was arrested by the Jackson Police Department in 2013 for possession of marijuana with intent to distribute. White is reported to be an associate of Turner and a strong supporter of Robert Shuler Smith. White's case has never been indicted by the District Attorney. The Police Department recently inquired about the status of the case and was told by a representative of the District Attorney that they never received the case. The Jackson Police Department retained a receipt from the District Attorney's Office, however, proving that the case had been dropped off in May of 2014. The District Attorney's Office employee who signed for the case was Deondra (aka "Dee") Parker. Parker is the mother of two of

Donald Turner's children and has been suspected of deliberately pulling cases related to Turner and his associates.

It has been extensively reported that Robert Shuler Smith maintains an improper relationship with local business owners of Indian descent. The reporting suggests that Smith shields the store owners from criminal prosecution for illicit activity that is conducted at their business locations. Chirag Kharbanda, the owner of the former Express Fuel Store on Northside Drive in Jackson, has been arrested multiple times by the Jackson Police Department for a variety of crimes and is under active investigation for drug trafficking. Reporting suggests that Smith's office has deliberately avoided prosecuting Kharbanda due to Smith's ties to the store owning community.

Please feel free to contact me directly if more information is required.

Respectfully,


Robert Culpepper
Special Agent